

# Exhibit 6

**From:** [owner-defendants-mdl3047jccp5255@skaddenlists.com](mailto:owner-defendants-mdl3047jccp5255@skaddenlists.com) on behalf of [Halperin, Gregory](#)  
**To:** [Hazam, Lexi J.](#); [Simonsen, Ashley M.](#); [Warren, Previn](#)  
**Cc:** [MDL 3047 Co-Lead Firms](#); [Defendants-MDL3047JCCP5255@skaddenlists.com](mailto:Defendants-MDL3047JCCP5255@skaddenlists.com); [SM.MDLAGLeads@coag.gov](mailto:SM.MDLAGLeads@coag.gov); [EXT - Jennifer Scullion](#); [jennie.anderson](mailto:jennie.anderson)  
**Subject:** RE: [EXT] RE: MDL 3047 - Plaintiff Fact Sheet Deficiencies  
**Date:** Friday, April 5, 2024 5:38:46 PM  
**Attachments:** [image005.png](#)  
[image001.png](#)

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**CAUTION: MAIL FROM OUTSIDE THE FIRM**

Lexi,

Below is a list of the PI Plaintiffs for which Defendants have no record of receiving a PFS. If you believe a PFS has been submitted for any of these Plaintiffs, please let us know promptly.

Thanks,  
 Greg

\* \* \*

ND Cal Case No.	MDL-Centrality ID Number
22-cv-04709	1743
22-cv-04710	1730
22-cv-04712	1755
22-cv-04937	1740
22-cv-05546	1708
22-cv-05886	1568
22-cv-05888	1563
22-cv-06138	1558
22-cv-06162	1539
22-cv-06167	1291
22-cv-06193	1300
22-cv-06205	1725
22-cv-06209	1529
22-cv-06214	1549
22-cv-06263	
22-cv-06279	1282
22-cv-06296	1560

22-cv-06428	1544
22-cv-06436	1555
22-cv-06455	1732
22-cv-06692	1533
22-cv-06812	1543
22-cv-07347	1720
23-cv-01465	1742
23-cv-01585	1741
23-cv-01588 (New case number for existing plaintiff, original case number is 22-cv- 04710)	1731
23-cv-02630	1745
23-cv-02644	1705
23-cv-03498	1722
23-cv-03638	1694
23-cv-03800	1682
23-cv-03801	1697
23-cv-03978	1744
23-cv-04226	1348
23-cv-05073	1386
23-cv-06128	1679
24-cv-00221	2121
24-cv-00794	1616
24-cv-01266	
24-cv-01268	
24-cv-01326	1951
24-cv-01527	2049
24-cv-01777	2036
24-cv-01817	2118
24-cv-01954	2024

**Gregory L. Halperin**

Pronouns: He/Him/His

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**From:** owner-defendants-mdl3047jccp5255@skaddenlists.com <owner-defendants-mdl3047jccp5255@skaddenlists.com> **On Behalf Of** Hazam, Lexi J.

**Sent:** Friday, April 5, 2024 2:00 PM

**To:** Simonsen, Ashley M <asimonsen@cov.com>; Warren, Previn <pwarren@motleyrice.com>

**Cc:** MDL 3047 Co-Lead Firms <MDL3047COLEADFIRMS@listserv.motleyrice.com>; Defendants-MDL3047JCCP5255@skaddenlists.com; SM.MDLAGLeads@coag.gov; Jennifer Scullion <JScullion@seegerweiss.com>; jennie.anderson <jennie.anderson@andrusanderson.com>

**Subject:** RE: [EXT] RE: MDL 3047 - Plaintiff Fact Sheet Deficiencies

**[EXTERNAL]**

Ashley,

We continue to disagree with many of the assertions in Defendants' letter. We will not rehash the arguments here, but we should have clarity as to the universe of PI Plaintiffs at issue. To that end please send us forthwith the list of 45 PI Plaintiffs who Defendants allege have not submitted PFSs, and the 37 of those Defendants allege filed complaints prior to 1/29/24.

You indicate Defendants intend to raise this matter with the Court. Please advise as to how and when Defendants intend to do so.



**Lexi J. Hazam**

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**From:** [owner-mdl3047coleadfirms@listserv.motleyrice.com](mailto:owner-mdl3047coleadfirms@listserv.motleyrice.com) <[owner-mdl3047coleadfirms@listserv.motleyrice.com](mailto:owner-mdl3047coleadfirms@listserv.motleyrice.com)> **On Behalf Of** Simonsen, Ashley M

**Sent:** Friday, April 5, 2024 9:30 AM

**To:** Warren, Previn <[pwarren@motleyrice.com](mailto:pwarren@motleyrice.com)>

**Cc:** MDL 3047 Co-Lead Firms <[MDL3047COLEADFIRMS@listserv.motleyrice.com](mailto:MDL3047COLEADFIRMS@listserv.motleyrice.com)>; [Defendants-MDL3047JCCP5255@skaddenlists.com](mailto:Defendants-MDL3047JCCP5255@skaddenlists.com); [SM.MDLAGLeads@coag.gov](mailto:SM.MDLAGLeads@coag.gov); Jennifer Scullion <[JScullion@seegerweiss.com](mailto:JScullion@seegerweiss.com)>; jennie.anderson <[jennie.anderson@andrusanderson.com](mailto:jennie.anderson@andrusanderson.com)>

**Subject:** [EXT] RE: MDL 3047 - Plaintiff Fact Sheet Deficiencies

Counsel,

Please see attached.

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**From:** Warren, Previn <[pwarren@motleyrice.com](mailto:pwarren@motleyrice.com)>

**Sent:** Wednesday, April 3, 2024 2:10 PM

**To:** Simonsen, Ashley M <[asimonsen@cov.com](mailto:asimonsen@cov.com)>

**Cc:** MDL 3047 Co-Lead Firms <[MDL3047COLEADFIRMS@listserv.motleyrice.com](mailto:MDL3047COLEADFIRMS@listserv.motleyrice.com)>; [Defendants-MDL3047JCCP5255@skaddenlists.com](mailto:Defendants-MDL3047JCCP5255@skaddenlists.com); [SM.MDLAGLeads@coag.gov](mailto:SM.MDLAGLeads@coag.gov); Jennifer Scullion <[JScullion@seegerweiss.com](mailto:JScullion@seegerweiss.com)>; jennie.anderson <[jennie.anderson@andrusanderson.com](mailto:jennie.anderson@andrusanderson.com)>

**Subject:** RE: MDL 3047 - Plaintiff Fact Sheet Deficiencies

[EXTERNAL]

Ashley,

Please see the attached correspondence from the PI/SD Plaintiffs.

Best,  
Previn



**Previn Warren** (he / him)  
Attorney at Law

401 9th St. NW, Suite 630, Washington, DC 20004  
o. [202.386.9610](tel:202.386.9610) c. [202.578.6281](tel:202.578.6281)  
[pwarren@motleyrice.com](mailto:pwarren@motleyrice.com)

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**From:** Warren, Previn

**Sent:** Wednesday, April 3, 2024 8:06 AM

**To:** Simonsen, Ashley M <[asimonsen@cov.com](mailto:asimonsen@cov.com)>

**Cc:** MDL 3047 Co-Lead Firms <[MDL3047COLEADFIRMS@listserv.motleyrice.com](mailto:MDL3047COLEADFIRMS@listserv.motleyrice.com)>; [Defendants-MDL3047JCCP5255@skaddenlists.com](mailto:Defendants-MDL3047JCCP5255@skaddenlists.com); [SM.MDLAGLeads@coag.gov](mailto:SM.MDLAGLeads@coag.gov); Jennifer Scullion <[JScullion@seegerweiss.com](mailto:JScullion@seegerweiss.com)>

**Subject:** Re: MDL 3047 - Plaintiff Fact Sheet Deficiencies

Ashley,

We will endeavor to respond to your letter by 5pm EST today. Thanks.

Previn

On Apr 2, 2024, at 7:54 PM, Simonsen, Ashley M <[asimonsen@cov.com](mailto:asimonsen@cov.com)> wrote:

CAUTION:EXTERNAL

Counsel,

Please see attached correspondence from Defendants.

**Ashley Simonsen**

Pronouns: She/Her/Hers

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Los Angeles, CA 90067-4643  
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